

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
LAFAYETTE DIVISION**

THE STATE OF LOUISIANA,  
By and through its Attorney General,  
Elizabeth B. Murrill, et al.

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF  
COMMERCE, et al.,

*Defendants.*

No. 6:25-cv-00076-DCJ-DJA

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO INDIVIDUAL VOTERS' MOTION TO INTERVENE**

Pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Civil Rule 7.9, Defendants respectfully move this Court for an extension of time until March 10, 2025 to respond to the individual voters' (Proposed Intervenor) Motion to Intervene, ECF No. 3. In support of this motion, Defendants state as follows:

1. On February 18, 2025, Defendants requested a two-week extension of time, ECF No. 38, to respond to the individual voters' Motion to Intervene, ECF No. 3. On February 19, the Court granted Defendants' requested extension. ECF No. 44.

2. Since Defendants requested an extension of time to respond, new leadership has begun to onboard at the Department of Commerce and Bureau of the Census. Defendants have sought the views of new leadership about this matter, and respectfully request an extension of one week (March 10, 2025) to continue to confer with new leadership about the appropriate response to the individual voters' Motion to Intervene, ECF No. 3.

3. The requested extension will not delay the proceedings or otherwise prejudice any party.

4. On March 2, 2025, Defendants sought the view of Plaintiffs on this motion, and they do not oppose the extension. Defendants also sought the view of Proposed Intervenor on this motion, and they likewise do not oppose the extension, provided that their deadline to file a reply—as to both Defendants’ and Plaintiffs’ response to their Motion—is similarly extended so that they are thereby able to file a single reply. Otherwise, Proposed Intervenor would oppose this Motion for Extension.

For the foregoing reasons, good cause exists for the Court to grant this motion, and Defendants respectfully request that the Court grant the requested extension of time until March 10, 2025 for Defendants to respond to Proposed Intervenor’s Motion, ECF No. 3. Defendants also request that Proposed Intervenor’s deadline to reply to Plaintiffs, *see* ECF No. 36, likewise be extended. A proposed order is attached.

Dated: March 2, 2025

Respectfully submitted,

YAAKOV M. ROTH  
Acting Assistant Attorney General  
Civil Division

ALEXANDER K. HAAS  
Director

STEPHEN M. ELLIOTT  
Assistant Director

/s/ Kevin K. Bell  
KEVIN K. BELL  
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*Counsel for the United States*

**CERTIFICATE OF CONFERENCE**

On March 2, 2025, I met and conferred electronically with Plaintiffs and Proposed Intervenor with respect to this Motion for Extension, pursuant to Local Civil Rule 7.4.1. Plaintiffs indicated that they do not oppose the Motion for Extension, and Proposed Intervenor indicated that they also do not oppose Defendants' Motion for Extension, provided that Proposed Intervenor's deadline to file a reply—as to both Defendants' and Plaintiffs' response to their Motion to Intervene—is similarly extended so that they are thereby able to file a single reply. Otherwise, Proposed Intervenor would oppose this Motion for Extension.

/s/ Kevin K. Bell  
KEVIN BELL  
(GA Bar No. 967210)  
Trial Attorney

**CERTIFICATE OF SERVICE**

On March 2, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court for the Western District of Louisiana, using the electronic case filing system of the Court. I hereby certify that I have served all parties electronically or by another manner authorized by Fed. R. Civ. P. 5(b)(2).

/s/ Kevin K. Bell  
KEVIN BELL  
(GA Bar No. 967210)  
Trial Attorney